

MARK STEGER SMITH
Assistant U.S. Attorney
U.S. Attorney's Office
2601 Second Avenue North, Suite 3200
Billings, MT 59101
Ph: (406) 247-4667; Fax: (406) 657-6058
mark.smith3@usdoj.gov

PAUL E. SALAMANCA
Deputy Assistant Attorney General
Environment and Natural Resources Division
United States Department of Justice

LUTHER L. HAJEK (CO Bar 44303)
Natural Resources Section
999 18th St., South Terrace, Suite 370
Denver, CO 80202
Ph: (303) 844-1376; Fax: (303) 844-1350
luke.hajek@usdoj.gov

Counsel for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

WESTERN ORGANIZATION OF)
RESOURCE COUNCILS, *et al.*,)
Plaintiffs,) Case No. 4:20-cv-00076-BMM-JTJ
v.)
U.S. BUREAU OF LAND)
MANAGEMENT,) **UNOPPOSED MOTION FOR AN**
Defendant,) **EXTENSION OF TIME TO**
and) **RESPOND TO THE COMPLAINT**

STATE OF WYOMING,)
)
Intervenor Defendant)
)
_____)

Defendant Bureau of Land Management moves, unopposed, for a three-week extension to file its answer or, in the alternative, its motion under Rule 12(b). Defendant's responsive pleading is currently due on November 2, 2020. Defendant respectfully that this deadline be extended to November 23, 2020.

"When an act may or must be done within a specified time, the court may, for good cause, extend the time, with or without motion . . . if a request is made, before the original time or its extension expires." Fed. R. Civ. P. 6(b)(1)(a). Good cause exists here. Defendant's counsel Luther L. Hajek is responsible for filing a summary judgment brief on November 6, 2020 in *Montana Wildlife Federation v. Bernhardt*, No. 4:18-cv-69-BMM, as well as obligations in other matters. Therefore, Defendants' counsel requires additional time to prepare a response to the complaint in this case.

Counsel for Defendant has conferred with counsel for Plaintiffs and counsel for Intervenor Defendant. No party opposes this motion. A proposed order is attached.

DATED: October 23, 2020

Respectfully submitted,

MARK STEGER SMITH

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PAUL E. SALAMANCA,
Deputy Assistant Attorney General
Environment & Natural Resources Division

/s/ Luther L. Hajek
LUTHER L. HAJEK (CO Bar 44303)
Trial Attorney, Natural Resources Section
United States Department of Justice
Environment and Natural Resources Div.
999 18th St., South Terrace, Suite 370
Denver, CO 80202
Tel: (303) 844-1376
Fax: (303) 844-1350
E-mail: luke.hajek@usdoj.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on October 23, 2020, a copy of the foregoing was served on all counsel of record via the Court's CM/ECF system.

/s/ Luther L. Hajek
LUTHER L. HAJEK
U.S. Department of Justice